

Message

From: STEVE LAWRY [lawrylts@sbcglobal.net]
Sent: 10/8/2014 2:04:54 AM
To: Karlson, Kristine [Karlson.Kristine@epa.gov]
CC: Chew, Sandra [Chew.Sandra@epa.gov]; Bromley, Eugene [Bromley.Eugene@epa.gov]
Subject: Re: DMR information request

Hi Kristine, sorry, I've been in the field all day, back late, and will be out again tomorrow. I have a meeting with FM O&G in the morning and will get back to you in regards to their position on this as soon as I know more.....best regards

Steven G. Lawry
Environmental and NPDES Compliance Specialist
State Certified Potable Water Distribution Operator
Marine Biologist, LTS Environmental, Inc.
(805) 644-4560

From: "Karlson, Kristine" <Karlson.Kristine@epa.gov>
To: STEVE LAWRY <lawrylts@sbcglobal.net>
Cc: "Chew, Sandra" <Chew.Sandra@epa.gov>; "Bromley, Eugene" <Bromley.Eugene@epa.gov>
Sent: Tuesday, October 7, 2014 1:46 PM
Subject: RE: DMR information request

Steve – I have called two operators – Pacific Operators Offshore and Vanoco – and both told me I could proceed with a conference call with you without them in attendance. According to my attorney, that's all I needed to proceed. I still have the afternoon unscheduled, if you want to have a call today. Please let me know if you're available.

Thanks,
Kristine

Kristine Karlson
(415) 947-4297

From: STEVE LAWRY [mailto:lawrylts@sbcglobal.net]
Sent: Tuesday, October 07, 2014 7:48 AM
To: Karlson, Kristine
Cc: Chew, Sandra; Bromley, Eugene
Subject: Re: DMR information request

I'll see what I can do. I have worked directly with Sandra and Eugene many times in the past representing my clients so I thought we could get some history on the subject covered between us first and then pull the operators into it. I'll have one of them contact you instead and I'll stand aside. If you guys want me on the call, please advise. (I have some pertinent information that should be considered by EPA prior to rolling out the new EPA DMR forms - bottom line, some of them have incorrect information for the facility).

Have a great day.

Steven G. Lawry
Environmental and NPDES Compliance Specialist
State Certified Potable Water Distribution Operator

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(805) 644-4560

From: "Karlson, Kristine" <Karlson.Kristine@epa.gov>
To: STEVE LAWRY <lawrylts@sbcglobal.net>
Cc: "Chew, Sandra" <Chew.Sandra@epa.gov>
Sent: Monday, October 6, 2014 4:20 PM
Subject: RE: DMR information request

As I said, Steve – I prefer to have this conversation with the permittee(s) directly. It is, of course, fine if you're on the phone at their request, but they are my audience. Sandra and I are both available tomorrow, but Eugene is not. The next time we're all available is Thursday afternoon. In the interest of time, I believe Eugene will understand if we have to talk tomorrow... but please get one of your clients on the line.

-Kristine

Kristine Karlson
(415) 947-4297

From: STEVE LAWRY [<mailto:lawrylts@sbcglobal.net>]
Sent: Monday, October 06, 2014 2:45 PM
To: Karlson, Kristine
Cc: Chew, Sandra
Subject: Re: DMR information request

Yes, Freeport McMoRan. I left you a message. Lets talk you and me talk first if you want, Sandra too if she can make it today?. I can explain some of the history on these DMRs. My contact for FM O&G is on vacation, but I am meeting with her on Wed to go over this more.

Steven G. Lawry
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From: "Karlson, Kristine" <Karlson.Kristine@epa.gov>
To: STEVE LAWRY <lawrylts@sbcglobal.net>; "Chew, Sandra" <Chew.Sandra@epa.gov>
Cc: "Bromley, Eugene" <Bromley.Eugene@epa.gov>; Juris Ruth <Ruth.Juris@fmi.com>
Sent: Monday, October 6, 2014 8:42 AM
Subject: RE: DMR information request

Steve – Does "FM" mean Freeport-McMoRan? Please let me know ASAP if you are able to schedule a call based on all of our schedule constraints. FYI, my pdf copies of the two letters you are comparing seem to be complete. Note that Beta Offshore did not get the same letter as Freeport-McMoRan, although both contain the directive to change how DMRs are submitted.

-Kristine

Kristine Karlson
(415) 947-4297

From: STEVE LAWRY [<mailto:lawrylts@sbcglobal.net>]
Sent: Monday, October 06, 2014 8:01 AM

To: Chew, Sandra; Karlson, Kristine
Cc: Bromley, Eugene; Juris Ruth
Subject: Re: DMR information request

Hi Sandra / Kristine, in further thought, I think getting all operators and EPA together on one call will be difficult. I'd suggest we start with a joint call to go over the letter of request for FM O&G. I'll try to get in touch with them and see their availability and I'll call Kristine when I know more.

I also just got done reviewing a similar letter for Beta Offshore and it appeared to be missing page 2 in the PDF form.

Best regards

Steven G. Lawry
Environmental and NPDES Compliance Specialist
State Certified Potable Water Distribution Operator
Marine Biologist, LTS Environmental, Inc.
(805) 644-4560

From: "Chew, Sandra" <Chew.Sandra@epa.gov>
To: "Karlson, Kristine" <Karlson.Kristine@epa.gov>; STEVE LAWRY <lawrylts@sbcglobal.net>
Cc: "Bromley, Eugene" <Bromley.Eugene@epa.gov>
Sent: Monday, October 6, 2014 6:10 AM
Subject: RE: DMR information request

Tuesday works for me or Thursday afternoon.

Sandra Chew
US EPA Region 9 - Enf-4-1
75 Hawthorne Street
San Francisco, CA 94105
Phone: 415-972-3335

From: Karlson, Kristine
Sent: Thursday, October 02, 2014 3:38 PM
To: STEVE LAWRY
Cc: Bromley, Eugene; Chew, Sandra
Subject: RE: DMR information request

Hi, Steve – Sorry if I missed your call today. I've been in meetings. Would be happy to entertain a call next week. If you'll be coordinating, please provide dates and times when people are available. As for myself, the best times would be anytime on Tuesday, or the afternoons of either Wednesday or Thursday.

Eugene – when are you available next week?

FYI, Sandra Chew will also be on the call – I'll let her chime in with her schedule availability.

-Kristine

Kristine Karlson
(415) 947-4297

From: STEVE LAWRY [<mailto:lawrylts@sbcglobal.net>]
Sent: Thursday, October 02, 2014 9:30 AM

To: Karlson, Kristine
Cc: Bromley, Eugene
Subject: Re: DMR information request

Thanks Kristine. I think a call is a great idea. How about we set up a joint call with everyone's DMRs you are concerned about. I can contact them all and see if we can pick a date that would meet everyone's schedule. I have worked with Eugene through the WSPA group members in the past on permitting and that worked great, but the problem now is not everyone are WSPA members anymore. So if we set up a joint call, we'll have to round them all up together. Depending on what option is taken, I think it would also be helpful to consider giving the operators and consultants involved in preparing the DMRs more time than I saw in one of the letters (30-60 days). It may take time to set up the calls and make management decisions between multiple companies on the direction everyone will take.

I'll call you later today to discuss how we proceed and I look forward in working with you.....best regards

Steven G. Lawry
Environmental and NPDES Compliance Specialist
State Certified Potable Water Distribution Operator
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From: "Karlson, Kristine" <Karlson.Kristine@epa.gov>
To: STEVE LAWRY <lawrylts@sbcglobal.net>
Cc: "Bromley, Eugene" <Bromley.Eugene@epa.gov>
Sent: Thursday, October 2, 2014 8:44 AM
Subject: RE: DMR information request

Hi, Steve –

If one of your clients has shared a copy of its information request with you, please take a look at the options listed. There is critical coding information provided on the preprinted DMRs that has been missing from submittals, and we need each of these permittees to select one of the three options for the remainder of the permit term (which extends over the next 4 ½ years). Without the information, it is extremely difficult to match up reported values with permit limits in our system. There are also issues with how information is being consolidated within a given page. It appears that information has been consolidated to save space and paper, which I can understand – these are long reports. But the timeframes for which information is being reported need to be crystal clear on each page, and consolidating the information is frequently not going to be helpful from our perspective.

Perhaps we should have a call. I would feel more comfortable talking with you if one of your clients attended... they are our permittees, after all, and we have no direct relationship with you. Let me know if you're planning on coordinating such a call, and get it on the calendar ASAP.

Thanks,
Kristine

Kristine Karlson
(415) 947-4297

From: STEVE LAWRY [mailto:lawrylts@sbcglobal.net]
Sent: Wednesday, October 01, 2014 3:47 PM
To: Karlson, Kristine
Cc: Bromley, Eugene
Subject: DMR information request

Hi Kristine. I have several clients (FM O&G, Beta Offshore, POOI, Venoco) that have received word that you are requesting additional information in the DMR forms being submitted. When you have a minute, can you call me to discuss what you need. It was my understanding the current forms that I assist my clients in filling out would need a code number included and I wanted to know if I include the code number on our forms from Sandra Chew's March DMR form mailings, that would be adequate. That would be a lot easier then converting over to a new DMR format which is much more lengthy. Plus, the NetDMR may be mandated next year so it would be a lot easier on the industry if we could make minor change until then.

Thank you so much and I look forward to hearing from you.

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